



Southern California Trawlers Association

July 8, 2014

Mr. Michael Sutton, President
California Fish and Game Commission
1416 Ninth Street
Sacramento, CA 95814

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FISH AND GAME
COMMISSION

2014 JUL 14 PM 1:47

MS

RE: INADVERTENT CHANGE IN RIDGEBACK INCIDENTAL CATCH REGULATIONS

Dear Mr. Sutton:

As you know, our Association members are small artisanal trawl vessels that fish for California Halibut, Sea Cucumbers and Ridgeback Prawn seasonally. For small boats operating out of local ports and harbors, it is essential that we have the ability to fish for a suite of species, so that we can keep fresh local seafood coming over the docks to our local communities.

Recently we were made aware of a change in regulations on the incidental catch of ridgeback prawns while fishing for the other species. We were not consulted by the Department or Commission when this change was made, and it is causing needless hardship for our members and for all of the new direct-to-consumer fresh/local seafood enterprises that have become so popular along the California coastline.

We would like to bring this to the attention of the Commission and staff, as well as the Marine Subcommittee members, and discuss it with you at the next available Marine Subcommittee and full Commission meetings, to explain what the details of the issue are and why we would like to propose that the regulations be amended back to what existed prior to the inadvertent change made several years ago (which we just were notified about via enforcement personnel a few months ago).

Consumers along the docks are asking why they can't get a few pounds of ridgebacks all the time now, and we're having to tell them that the regulations have changed such that they can only be landed between October and May. The Community Supported Fisheries (CSF) program, as well as local farmers/fishermens markets, in particular, have been adversely affected by this inessential change in fisheries regulations.

Thank you for your attention to this matter, and we look forward to discussing this with you at the Marine Subcommittee on August 5th, 2014 during the agenda item listed as

"7. INITIAL DISCUSSION OF INCIDENTAL TAKE AND BYCATCH IN CALIFORNIA'S FISHERIES"

and at the next Commission meeting under [General] Public Comment.

Sincerely,

Mike McCorkle, President

c: Mr. Richard Rogers, Mr. Sonke Mastrup, Ms. Susan Ashcraft, Mr. Charles Bonham,
Mr. Craig Shuman

RATIONALE TO RE-INSTATE STRICKEN TITLE 14 REGULATORY LANGUAGE REGARDING INCIDENTAL TAKE OF 50 POUNDS OR 15% BY WEIGHT OF RIDGEBACK PRAWNS

- There is no biological rationale for prohibiting 50 lbs. of ridgebacks while trawling for sea cucumbers or halibut, nor is there a reason for the prohibition during the targeted-fishery season closure.

Ridgebacks come and go from the Santa Barbara Channel on multi-year cycles with high variability; there is no evidence that this stock is not healthy and abundant.

- There is no management rationale for prohibiting 50 lbs. of ridgebacks while trawling for sea cucumbers or halibut, nor is there a reason for the prohibition during the targeted-fishery season closure. The ridgeback fishery has dwindled due to a number of factors:
 - ... they are difficult to market due to auto-digestion characteristics of the species;
 - ... fewer and fewer boats fishing for them (“graying of the fleet”). There are only a dozen or so boats that trawl ridgebacks in the SBC during the target season. There is not heavy fishing pressure on the stock, which is likely well above MSY, but, again, it’s a “data-poor” fishery.
- we have fresh local markets and seafood consumers that have come to depend on small quantities of ridgeback year-round:
 - Community Supported Fisheries Program (UCSB/MSI, SBMNH)
See <http://www.communityseafood.com/>
 - Salty Girl Seafood Company (UCSB/Bren)
See <http://www.pacbiztimes.com/2014/03/14/angling-for-change-bren-school-startup-serves-up-new-model-for-sustainable-seafood/>
 - Saturday Ventura Fishermen’s Market
See <http://www.ventura-usa.com/calendar-of-events/index.cfm?EventID=1245>
 - Other entrepreneur-buyers in Santa Barbara Harbor

Because of this oversight in regulatory reform in 2008, there will now be no ridgeback shrimp for any of these markets between June 1 to September 30. This is a significant impact to these trawl fishermen and community markets that could have been avoided with consultation.

It is very important to develop and continue to support these fresh, local, direct-to-consumer markets so that the public begins to understand the nature of community-based fisheries and be able to access the products derived from them. This is the model purportedly endorsed by all of the statewide, national and multinational ocean protection nonprofits.

- there is an economic benefit to small, artisanal trawl fishermen in keeping and selling fresh local ridgebacks in small quantities to these markets. It is part of the required “portfolio” of fisheries necessary in the age of limited entry permits for a small boat to stay in business.
- No affected trawl fishermen were notified about the proposed ridgeback prawn regulation changes. Why not?